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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALYSSA G. OLSON
IN SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF GOOGLE'S MOTION
FOR SUMMARY JUDGEMENT**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Alyssa G. Olson, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion to Seal Portions of Google’s Motion for Summary Judgment
8 (“Motion”). In making this request, Google has carefully considered the relevant legal standard and
9 policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the good
10 faith belief that certain information sought to be sealed consists of Google’s confidential information
11 and that public disclosure could cause competitive harm.

12 3. The information requested to be sealed contains Google’s non-public, sensitive
13 confidential and proprietary business information that could affect Google’s competitive standing
14 and may expose Google to increased security risks if publicly disclosed, including details related to
15 Google’s internal projects, internal identifiers, data signals and logs, and their proprietary
16 functionalities, as well as internal metrics, which Google maintains as confidential in the ordinary
17 course of its business and is not generally known to the public or Google’s competitors.

18 4. Such highly confidential information reveals Google’s internal strategy and systems
19 regarding various important products and nonpublic investigations thereto and falls within the
20 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. The redacted
21 portions also contain, summarize or reflect material designated, Confidential or Highly Confidential
22 – Attorneys’ Eyes Only Pursuant to Stipulated Protective Order.

23 5. Public disclosure of such highly confidential information could affect Google’s
24 competitive standing as competitors may alter their system designs and practices relating to
25 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise
26 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,
27 as third parties may seek to use the information to compromise Google’s internal systems and
28 operations.

1 6. Google also respectfully requests that the Court seal the portions of the materials
2 filed with Google's Motion for Summary Judgment that contain, reflect, or summarize information
3 Plaintiffs have previously designated as confidential according to the Stipulated Protective Order
4 (Dkt. 81).

5 7. For these reasons, Google respectfully requests that the Court order the identified
6 portions of Google's Motion for Summary Judgment and accompanying materials to be filed under
7 seal.

8 I declare under penalty of perjury of the laws of the United States that the foregoing is true
9 and correct. Executed in Culver City, California on March 21, 2023.

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11 DATED: March 21, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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14 By /s/ Alyssa G. Olson
15 Alyssa G. Olson
16 Attorney for Defendant
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